

Federal Communications Commission Washington, D.C. 20554

February 4, 2015

Michael P. Flynn
Director, Office of Radiation and Indoor Air
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Mail Stop 6601T
Washington, DC 20460

Dear Mr. Flynn:

On March 29, 2013, the FCC opened a *Notice of Inquiry (Inquiry)* to consider whether recent research into the possible health effects of radiofrequency (RF) emissions, changes in usage patterns of RF emitters of all types, and various recent standards-setting activities warrant a reexamination of the FCC's exposure limits and policies for all regulated sources of RF emissions. In its *Inquiry*, the FCC specifically solicited input from federal health and safety agencies and institutes on the propriety of our present exposure limits. The Government Accountability Office (GAO) also indicated that the FCC should solicit such expert opinion.²

The FCC is not a health and safety agency, and we defer to other organizations and agencies such as yours to interpret the biological research necessary to assess the health impact of RF emissions, and to determine what exposure levels can be considered safe for humans. The FCC has in the past relied on recommendations from federal health and safety agencies and institutes, including the EPA, in adopting its present rules limiting human exposure to RF energy.

The public response to the *Inquiry* forms a significant portion of the record in this proceeding. In response to the *Inquiry*, the EPA indicated its appreciation that the FCC was working closely with and relying on guidance of other federal agencies with expertise in public health.³ We welcome EPA's collaboration, and as we continue our analysis of the issues addressed and information sought in the *Inquiry*, I encourage the EPA to submit substantive comments to the record responding to the various issues the *Inquiry* raised.

Your views are appreciated on all matters on which you may wish to comment. We seek your expertise in evaluating the implications of any and all research done in this area, and how they inform what changes, if any, the FCC should make to its fundamental human exposure guidelines, as well as any of the implementing rules, including measurement procedures used to

See Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies, Notice of Inquiry, ET Docket No. 13-84, FCC 13-39, March 29, 2013, available at: http://hraunfoss.fcc.gov/edocs public/attachmatch/FCC-13-39A1.docx.

See *Telecommunications: Exposure and Testing Requirements for Mobile Phones Should Be Reassessed*, U.S. Government Accountability Office, GAO-12-771, July 24, 2012, available at: http://www.gao.gov/products/GAO-12-771.

Comments of EPA, available at: http://apps.fcc.gov/ecfs/document/view?id=7520941527.

"precautionary" measures endorsed by some parties, and we would appreciate your input on whether any such extra precaution is necessary. We would also particularly appreciate your views on whether the FCC's current whole-body average SAR limit of 0.08 W/kg, applied continuously, remains appropriate for the general public, given the body of health research, changes in usage, standards-setting activities, or any other factors, that were not available when the FCC established its current guidelines in 1996.

If you need any additional information, you may contact Bruce Romano, Associate Chief of our Office of Engineering and Technology, at Bruce.Romano@fcc.gov or by telephone at (202) 418-2470.

Sincerely,

Julius Knapp

Chief

Office of Engineering and Technology